

**STATUS:** Effective

**POLICY NUMBER:** WASTE-0600-NPD

**SUBJECT:** Remediation Program Guide (formerly known as the Risk Integrated System of Closure (RISC) Users Guide)

**AUTHORIZED:** Thomas W. Easterly, Commissioner

**SUPERSEDES:** WASTE-0060

**ISSUING OFFICE(S):** Office of Land Quality

**ORIGINALLY EFFECTIVE:** February 16, 2001

**RENEWED/REVISED:** 3/22/2012

**Disclaimer:** This Nonrule Policy Document (NPD) is being established by the Indiana Department of Environmental Management (IDEM), consistent with its authority under [IC 13-14-1-11.5](#). It is intended solely as guidance and shall be used in conjunction with applicable rules or laws. It does not replace applicable rules and laws, and, if it conflicts with these rules or laws, the rules or laws shall control. Pursuant to [IC 13-14-1-11.5](#), this policy will be available for public inspection for at least 45 days prior to presentation to the appropriate state environmental board and may be put into effect by IDEM 30 days afterward. If the nonrule policy is presented to more than one board, it will be effective 30 days after presentation to the last. IDEM also will submit the policy to the Indiana Register for publication.

## 1.0 PURPOSE

The purpose of this NPD is to provide information about administrative processes involved in the investigation, remedy selection, and closure of contaminated sites in the Office of Land Quality (OLQ).

This document provides information about how the OLQ is organized and electronic tools and resources available to the public. This document is intended to provide clear directions about the background and administrative processes for each remediation program. It serves as a supplement to the Remediation Closure Guide, which provides technical guidance regarding how to investigate and close contaminated sites.

## 2.0 SCOPE

This NPD applies to the following IDEM OLQ remediation programs: Indiana Brownfields Program, Leaking Underground Storage Tank Program, Excess Liability Trust Fund Program, Resource Conservation and Recovery Act (RCRA) Closure and Corrective Action Programs, Site Investigation Program, State Cleanup Program, Superfund Program, Defense Environmental Restoration Program, and Voluntary Remediation Program.

## 3.0 SUMMARY

For the OLQ, this NPD provides the following general information:

- The purpose and contents of the Remediation Program Guide
- Changes in approach to remediation
- Records of remedy selection and site closure
- Transition from the Risk Integrated System of Closure (RISC) and other existing policies to the Remediation Closure Guide
- Introduction to the OLQ remediation programs
- Document and electronic data submittal guidelines
- Who reviews documents submitted to IDEM
- Discussion of issues
- Emergency response referrals to the OLQ remediation programs

For each OLQ remediation program, this NPD provides information regarding:

1. Purpose and scope of the program
2. Rules and laws
3. Process overview
4. How a site enters the program
5. Emergency or immediate actions
6. Public involvement
7. Investigations
8. Remedy decisions

9. Remedial actions
10. Closure
11. Conditions subsequent to closure
12. When issues arise
13. Sample forms and checklists (samples and links to forms and checklists provided on the IDEM website)

#### 4.0 DEFINITIONS

A list of Acronyms and a Glossary are included in the NPD.

#### 5.0 ROLES

The Applicant shall:

- Submit an application for entry of a site into the Voluntary Remediation Program or a request for a Comfort Letter or Site Status Letter from the Indiana Brownfields Program
- Prepare or hire a Consultant on their behalf to prepare remediation work plans to present to the IDEM OLQ Project Manager regarding the remediation of a site
- Comply with applicable notification rules in [329 IAC 9](#)
- Respond to the IDEM OLQ Project Manager in a timely manner to all requests for information
- Provide data, maps, or records to the IDEM OLQ Project Manager that reflect site conditions
- (If participating in Voluntary Remediation Program) Reimburse IDEM for costs in accordance with a Voluntary Remediation Agreement

The Attorney shall:

- Draft and/or review legal documents, other project related documents, and correspondence, as needed
- Advise IDEM OLQ Project Managers and IDEM management
- Refer cases to the Indiana Attorney General, when necessary
- Participate in discussions with the Responsible Parties (RPs), Applicants, or Participants

The Branch Chief (BC) shall:

- Approve many documents such as letters to, and agreements with, Responsible Parties and Participants
- Assist OLQ Project Managers in the resolution of issues that arise relative to a site, as needed

The Consultant shall:

- Represent the Responsible Party, Applicant, or Participant
- Prepare work plans or other documents for a site on behalf of a Responsible Party, Applicant, or Participant
- Coordinate activities with the IDEM OLQ Project Manager to achieve closure of a site
- Submit plans, data, and documents as requested by the IDEM OLQ Project Manager
- Perform investigatory or remediation work as described in the work plans or other documents

The Program Participant (or Participant) shall:

- Prepare or hire a Consultant on their behalf to prepare remediation work plans to present to the IDEM OLQ Project Manager regarding the remediation of a site
- Comply with applicable notification rules in [329 IAC 9](#)
- Respond to the IDEM OLQ Project Manager in a timely manner to all requests for information
- Provide data, maps, or records to the IDEM OLQ Project Manager that reflect site conditions
- (If participating in Voluntary Remediation Program) Reimburse IDEM for costs in accordance with a Voluntary Remediation Agreement

The IDEM OLQ Project Manager shall:

- Coordinate and implement remediation activities with the Responsible Party and the Consultant
- Receive, evaluate, and provide comments on documents associated with the investigation, remediation, and closure of a site
- Prepare correspondence to the Responsible Party and Consultant that communicates the status of the remediation project
- Request technical staff review of remediation documents and incorporate the technical staff suggestions and comments into the correspondence to the Responsible Party and the Consultant
- Conduct internal team meetings with technical staff to discuss the site
- Conduct meetings with the Responsible Party or the Consultant to discuss approaches to the remediation or closure of a site
- Make decisions on the appropriate use of technology or remediation techniques at the site

- Conduct site visits as requested or necessary to view the nuances of the site
- Evaluate different proposals on their merit
- Complete the Record of Remedy Selection and Record of Closure forms to document the closure decisions and remedy selections at a site
- Ensure all pertinent documents are correctly loaded into the Virtual File Cabinet for storage

The Responsible Party shall:

- Prepare or hire a Consultant on their behalf to prepare remediation work plans to present to the IDEM OLQ Project Manager regarding the remediation of a site
- Comply with applicable notification rules in [329 IAC 9](#)
- Respond to the IDEM OLQ Project Manager in a timely manner to all requests for information
- Provide data, maps, or records to the IDEM OLQ Project Manager that reflect site conditions

The Science Services Branch (SSB) staff shall:

- Provide expertise and services in fields including, but not limited to, chemistry, geology, geological information systems, engineering, and risk assessment
- Review work plans and reports
- Perform field oversight of investigation or remediation activities, as needed
- Provide sampling expertise
- Evaluating the quality of the environmental data
- Develop and maintain electronic databases
- Participate in meetings and discussions with Responsible Parties or Participants, or the public, as needed

The Section Chief (SC) shall:

- Supervise program staff (IDEM OLQ Project Managers, Permit Managers, and Science Services Branch staff)
- Report directly to a Branch Chief
- Approve many documents such as letters to Responsible Parties and Participants and agreements with Responsible Parties and Participants
- Assist in the resolution of issues that arise relative to a site as needed

## **6.0 POLICY**

Download the complete Remediation Program Guide or a single section from <http://www.in.gov/idem/6726.htm>:

Section 1: Introduction  
Section 2: Indiana Brownfields Program  
Section 3: Leading Underground Storage Tank Program and Excess Liability Trust Fund Program  
Section 4: RCRA Closure and Corrective Action  
Section 5: Site Investigation Program  
Section 6: State Cleanup Program  
Section 7: Superfund and Defense Environmental Restoration Programs  
Section 8: Voluntary Remediation Program  
Appendix A: Links to Referenced Documents, Web and Internet Sites  
Appendix B: Acronyms  
Appendix C: Glossary

## **7.0 REFERENCES**

References are included in the Remediation Program Guide NPD.


## **8.0 SIGNATURES**

  
Thomas W. Easterly, Commissioner  
Indiana Department of Environmental Management

September 27, 2011  
Date


  
Bruce H. Palin, Assistant Commissioner  
Office of Land Quality

9/26/2011  
Date

  
David R. Joest, Assistant Commissioner  
Office of Legal Counsel and  
Office of Criminal Investigations

09/27/11  
Date

This policy is consistent with Agency requirements.

  
Quality Assurance Program, Planning and Assessment  
Indiana Department of Environmental Management

9/27/11  
Date

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An [html](#) version of this document.